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April 28, 2022

Via ECF

Hon. Kenneth K. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Re: Williams-Barr v. State of New York, No. 18 Civ. 9131 (KMK)

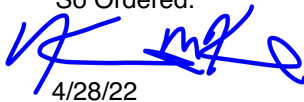
Dear Judge Karas:

This Office represents defendant the New York State Department of Corrections and Community Supervision ("DOCCS") in the above-captioned action. We write pursuant to Section IX of Your Honor's Individual Rules, the Southern District of New York's Sealed Records Filing Instructions, and Paragraph 9 of the Confidentiality Stipulation and Proposed Protective Order ("Protective Order") entered by this Court on August 13, 2021, (Dkt. No. 62), to respectfully request leave to file under seal certain content in the Declarations and Exhibits submitted in Support of the Defendant's Motion for Summary Judgment, Defendant's Rule 56.1 Statement of Facts, and Defendant's Memorandum of Law in Support of the Motion for Summary Judgment. The basis for this request is that the documents and material reference highly sensitive information, disclosure of which could jeopardize institutional security if placed in the public realm. The information is based on documents that were designated either Confidential or Attorney's Eyes Only under the Protective Order.

We thank the Court for its consideration of this request.

Granted.

So Ordered.


4/28/22

Respectfully submitted,

/s/

Julinda Dawkins
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cc: Mr. Van-Lare, Attorney for Plaintiff
(via ECF)